

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FOUR HUNDRED NINETY-NINTH OMNIBUS OBJECTION
(SUBSTANTIVE) OF THE COMMONWEALTH
OF PUERTO RICO TO DUPLICATE LITIGATION CLAIMS AND UNNAMED
PLAINTIFFS

Upon the *Four Hundred Ninety-Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Duplicate Litigation Claims and Unnamed Plaintiffs* [ECF No. 21756] (the “Four Hundred Ninety-Ninth Omnibus Objection”)² filed by the Commonwealth of Puerto Rico (the “Commonwealth” or the “Debtor”), dated August 5, 2022, for entry of an order

¹ The Debtors in the Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations)

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Ninety-Ninth Omnibus Objection.

disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Four Hundred Ninety-Ninth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Ninety-Ninth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Four Hundred Ninety-Ninth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the claims identified in the column titled “Claims to be Disallowed” in Exhibit A to the Four Hundred Ninety-Ninth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having been found to be duplicative of the Litigation Master Claims, as defined in the Four Hundred Ninety-Ninth Omnibus Objection; and the Court having determined that the relief sought in the Four Hundred Ninety-Ninth Omnibus Objection is in the best interest of the Commonwealth, its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Ninety-Ninth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Ninety-Ninth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Commonwealth’s right to object to the Litigation Master Claims is reserved; and it is further

ORDERED that Kroll is authorized and directed to designate the Claims to Be Disallowed as expunged on the official claims register in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 21756 in Case No. 17-3283;
and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters
arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Ninety-Ninth Omnibus Objection

Four Hundred Ninety-Ninth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	BALBIN PADILLA, CYNTHIA URB LOS ALMENDROS EB 5 CALLE TILO BAYAMON, PR 00961	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	38507	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.						
2	CANDELARIO ORTIZ, ALBA L. HC 01 BOX 10240 TOA BAJA, PR 00949-9795	06/01/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	45925	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						
3	CHACON RODRIGUEZ, MAYRA URB MONTE VERDE M 1303 CALLE MONTE GRANDE MANATI, PR 00674	05/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	31054	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.						

Four Hundred Ninety-Ninth Omnibus Objection
Exhibit A - Claims to Be Disallowed

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
4	CHACON RODRIGUEZ, MAYRA URB MONTE VERDE M 1303 CALLE MONTE GRANDE MANATI, PR 00674	05/30/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	42306	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.						
5	CRUZ QUINTERO, JUAN CARLOS CALLE JOSE JULIAN ACOSTA H21 BO AMELIA CATANO, PR 00962	05/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	38069	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Francisco Beltrán Cintrón et al. v. Puerto Rico Department of Family Affairs, Case No. KAC-2009-0809 ("Beltrán Cintrón"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 179140 and 93199, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Beltrán Cintrón.						
6	TORRES, GLENDAMID PO BOX 689 OROCOVIS, PR 00720	06/11/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	79250	Undetermined*
Reason: Claim purports to assert liabilities associated with the litigation captioned Madeline Acevedo Camacho et al. v. Puerto Rico Department of Family Affairs, No. 2016-05-1340 ("Acevedo Camacho"). However, based on documentation submitted by the attorney representing all claimants in the litigation, Claimant is not a named plaintiff in that litigation, and there is therefore no basis for claimant to assert liabilities associated with that litigation against the Commonwealth, HTA, ERS, or any other Title III debtor. Further, even if Claimant were in fact a plaintiff in that litigation, the claim would be duplicative of Claim nos. 32044 and 103072, the master proof of claims filed on behalf of all plaintiffs associated with the litigation captioned Acevedo Camacho.						
					TOTAL	Undetermined*